

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LOCAL NO. 46 METALLIC LATHERS UNION	:	
OF NEW YORK CITY AND VICINITY OF THE	:	
INTERNATIONAL ASSOCIATION OF BRIDGE,	:	
STRUCTURAL, ORNAMENTAL AND	:	CIVIL ACTION
REINFORCING IRON WORKERS,	:	
	:	
Plaintiff	:	NO. 07-11588 (JGK)
	:	
v.	:	
	:	
TRIPLE H. CONCRETE CORP.,	:	
	:	
Defendant	:	

REQUEST FOR ENTRY OF DEFAULT

To the Clerk of the Court:

Please enter the default of the defendant, Triple H. Concrete Corp., for failure to plead or otherwise defend this action as provided by the Federal Rules of Civil Procedure.

This request is made pursuant to Rule 55(a) and supported by the certification of R. Matthew Pettigrew, Jr., which is attached to this request.

January 30, 2008
Date

/s/ R. Matthew Pettigrew, Jr.
R. Matthew Pettigrew, Jr. (RP-9788)
Markowitz & Richman
1100 North American Building
121 South Broad Street
Philadelphia, PA 19107
215-875-3132

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Plaintiff	:	NO. 07-11588 (JGK)
	:	
v.	:	
	:	
TRIPLE H. CONCRETE CORP.,	:	
Defendant	:	

CERTIFICATION

R. MATTHEW PETTIGREW, JR. hereby certifies as follows:

1. This certification is made in support of the plaintiff's request for the entry of default against the defendant in this action.
2. I am the attorney for the plaintiffs and I have personal knowledge of the following facts.
3. This action was commenced on or about December 27, 2007, by the filing of a summons and complaint.
4. The defendant was served with the summons and complaint on January 8, 2008, as shown by the affidavit of service that has been filed with this Court.
5. The defendant has failed to plead or otherwise defend as provided by the Federal Rules of Civil Procedure.
6. More than twenty days have passed since service of the summons and complaint.

I certify that the foregoing statements are true.

January 30, 2008

Date

/s/ R. Matthew Pettigrew, Jr.

R. Matthew Pettigrew, Jr.

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	:	
v.	:	
	:	
TRIPLE H. CONCRETE CORP.,	:	
	:	
Defendant	:	

ENTRY OF DEFAULT

I, J. Michael McMahon, Clerk of the United States District Court for the Southern District of New York do hereby certify that the docket entries in the above-captioned action indicate that the summons and complaint were filed on or about December 27, 2007, and that on January 8, 2008, the defendant was served with a copy of the complaint and the summons as substantiated by the return of service that has been filed with this Court.

I further certify that the court records indicate that the defendant has not filed an answer or otherwise responded to the complaint, and that the time to answer has expired. Accordingly, it is hereby ORDERED that default is entered against the defendant.

J. Michael McMahon, Clerk

Deputy Clerk

DATED: New York, New York, _____, 2008.

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	:	
v.	:	
	:	
TRIPLE H. CONCRETE CORP.,	:	
	:	
Defendant	:	

CERTIFICATION OF SERVICE

I hereby certify that true and correct copies of the foregoing request for the entry of default and accompanying documents were served on this date, via first-class mail, postage prepaid, addressed as follows:

Triple H. Concrete Corp.
2375 Raynor Street
Ronkonkoma, NY 11779

I certify that the foregoing statements are true and correct.

January 30, 2008

Date

/s/ R. Matthew Pettigrew, Jr.

R. Matthew Pettigrew, Jr. (RP-9788)
Markowitz & Richman
1100 North American Building
121 South Broad Street
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